

#### CO0020508, Evans WWTF

- Violation
  - Ongoing BOD effluent violations
- Compliance Advisories
  - Notice of Significant Non-Compliance May 25, 2018
- Facility corrective action measures
  - In the April City Council update Evans states they have completed 94% of the construction of the \$38.4 million consolidation project and anticipate that the equipment testing and startup will be complete by the end of May 2018.
  - Evans has started up the new mechanical plant and is successfully meeting preliminary effluent limits for the facility. Evan will continue to monitor against the PEL limits until a new permit is issued for the facility but is currently reporting on the DMRs for the Hill-N-Park (CO0047287) facility. The new plant was constructed at the Hill-N-Park facility and utilizes the same effluent outfall.
  - The Evans WWTF (CO0020508) is waiting for the lift station construction to be complete. At the time of the site visit (July 24, 2018) the lift station was nearly complete but had run into start up issues with pumps not working. New pumps had been ordered and startup was optimistically anticipated in the next month or two. A call to the engineer for the project requesting an update has been made.
  - Evans also lost the three blowers that were not damaged in the historic 2013 floods but intends to install replacement blowers from the former lagoons at the Hill-N-Park facility in the interim while the lift station issues are addressed and resolved.
- WQCD enforcement response
  - The Division continues to monitor Evans' progress on the consolidation project. Significant improvements have been achieved by completion of the new consolidated treatment plant and. Once the lift station is online and the Evans WWTF is connected to the consolidated plant, discharge will cease from CO0020508.
- Other
  - The Division is currently working on the Permit for the new facility.

#### CO0000005, Harold D Thompson Regional WW Reclamation Facility

- Violation
  - Compliance Schedule: Activities to Meet Total Phosphorus - Commence Required Work or On-Site Construction
- Facility corrective action measures
  - Permit modification took effect on June 1, 2018.

- Compliance schedule now has Complete Required Work or On-Site Construction by September 30, 2018 and Achieve Final Compliance with Discharge Limits by December 31, 2018.
  - Substantial completion estimated by October 27, 2018.
  - The schedule item was completed late so the violation was not manually resolved.
- WQCD enforcement response
  - The Division will continue to monitor progress at the facility to meet the final limits. No action at this time.

**C00021261, City of La Junta**

- Violation
  - Effluent violations of potentially dissolved Selenium at outfall 003A for January, February, and March 2018.
- Compliance Advisories
  - Notice of Significant Non-Compliance February 16, 2018.
- Facility corrective action measures
  - La Junta received a Discharger Specific Variance for Selenium. The standard from the DSV took effect March 1, 2017.
  - La Junta has applied for a permit modification to incorporate the DSV standard. Once the modification takes effect, the selenium violations will be manually resolved.
  - The modified permit will take effect on September 1, 2018.
- WQCD enforcement response
  - No action at this time from enforcement.
- Potential future non-compliance
  - No anticipated impacts from current non-compliance on future compliance.

**C00021164, Leadville Sanitation District**

- Violation
  - Compliance Schedule: Activities to Meet Total Mercury Final Limits - Achieve Final Compliance with Emission or Discharge Limits Submit Study Results. Due date June 30, 2017.
- Compliance Advisories
  - August 18, 2017 (response received August 29, 2017)
  - November 22, 2017 (response received December 12, 2017)
- Facility corrective action measures
  - The facility discovered they were not monitoring with the correct method for detecting low-level mercury.
  - After discovering the error it was determined the facility likely would not be able to meet the final mercury limits reliably and consistently without additional investigation and possible improvements to the treatment process and collection system.

- Leadville has determined the likely source of mercury is from ambient levels in the groundwater as there is a long history of mining in the area and the California Gulch superfund site, contaminated with mercury, is nearby.
- Investigations into the integrity of the collection system are in the second phase and Leadville's engineers are formulating a plan to address inflow and infiltration as well as possibly locating other sources of mercury.
- Anticipated return to compliance is unknown at this time.
- WQCD enforcement response
  - The Division will be issuing a Notice of Violation / Cease and Desist Order.

#### **CO0044458, Regional WWTF (Alamosa)**

- Violation
  - Effluent violations for total recoverable Arsenic at outfall 001A for October 2017 through March 2018.
- Compliance Advisories
  - Notice of Significant Violation:
    - December 22, 2017
    - January 19, 2018
    - February 16, 2018
    - March 16, 2018
- Facility corrective action measures
  - Facility applied for a permit modification to allow for completion of the project to relocate the outfall, which will allow the facility to take advantage of a dilution credit that will make it possible for the facility to comply with arsenic limits.
  - During the plans review it was discovered that the outfall would be approximately 300 feet short of entering the Rio Grande River, which is required in order to receive the dilution credit.
  - Alamosa is currently working with Division staff to resolve the outfall location issues.
  - Design has been updated and approved by the Army Corp of Engineers and is in review by the Division. The review should be completed in the next week or so.
  - Anticipated return to compliance date is unknown at this time
- WQCD enforcement response
  - The Division is currently looking into the appropriateness of a Division initiated modification to allow for the requested extension of the compliance schedule and will coordinate with the City on making the proposed construction schedule enforceable if the permit modification is not warranted.
- Potential future non-compliance
  - Until the outfall is relocated and dilution credit is accounted for, Alamosa will not be able to meet the arsenic limits with current treatment.

#### **CO0023850, Rocky Ford WWTF**



- Violation
  - Effluent Violations for CBOD in March and May 2018
- Compliance Advisories
  - July 27, 2018
  - May 25, 2018
- Facility corrective action measures
  - Recent data indicates Rocky Ford is back in compliance with the CBOD limitations.
- WQCD enforcement response
  - No action proposed at this time
  - The Division is working to convert the facility to a minor in the ICIS database.

**CO0024392, Security Sanitation District WWTF**

- Violation
  - Compliance Schedule: Commence required Work or On-Site Construction (receive site approval)
- Compliance Advisories
  - December 22, 2017
- Facility corrective action measures
  - Security successfully received a permit modification to extend compliance schedule.
  - Permit modification took effect July 1, 2018.
  - Site location application received June 2018
  - C30 (Schedule Event unachieved but reported) violation will not be resolved because the event remains unachieved. The violation can be resolved once site approval is issued
- WQCD enforcement response
  - No action at this time. The Division intends to monitor progress with the updated compliance schedule but has confidence in the plan Security has presented to reach compliance with the final limits on time.
- Potential future non-compliance
  - No anticipated impacts from current non-compliance on future compliance with the permit modification taking effect.

**CO0026247, City of Sterling**

- Violation
  - Groundwater Compliance Schedule: Activities to Meet T.I.N. Final Limits
- Compliance Advisories
  - April 21, 2017
- Facility corrective action measures
  - Sterling continues to work with the Division on identifying the solution to meeting permit effluent limitations.

- Sterling ceased discharging to the groundwater basins on November 1, 2017, and there is not T.I.N. monitoring requirement for the surface water discharge.
- Anticipated return to compliance is unknown at this time.
- WQCD enforcement response
  - The Division continues to coordinate with Sterling and internally across multiple units, sections and divisions to identify possible solutions to the unique challenges faced by the Sterling facility. As an internal plan is developed, an enforcement escalation plan will also be determined.
- Potential future non-compliance
  - At this time, Sterling is unable to achieve compliance with the T.I.N. and TDS future limits for their groundwater discharge. The current interim solution from Sterling was to cease discharging to the groundwater recharge basins. The Division still expects Sterling to monitor the groundwater wells to determine the water quality of the water still moving through the aquifer from previous discharge into the basins. It is anticipated those results will continue to exceed the groundwater limitations until the wells are dry.

#### C00040142, Upper Fraser Valley TP

- Violation
  - Compliance Schedule: Activities to Meet Total Dissolved Copper - Achieve Final Compliance with Emission or Discharge Limits Submit Study Results Showing Compliance Attained; due April 30, 2017.
- Compliance Advisories
  - February 16, 2018
- Facility corrective action measures
  - Fraser received approval for their Site Location Amendment from the Division on August 14, 2018.
  - Fraser is installing metals and phosphorus removal treatment modifications
  - Anticipated return to compliance is unknown at this time.
  - Fraser requested a Major Modification to the Permit to include monthly copper limitations. The modification was approved and became effective on January 1, 2017. Fraser has had success meeting permit limitations with the monthly copper limits. The completion of the metals and phosphorus removal treatment modifications will provide a greater degree of confidence the facility will be able to meet the copper limitations reliably and consistently.
- WQCD enforcement response
  - The Division will continue working with the facility regarding the unique challenges faced by a resort town with three separate drinking water facilities feeding into the wastewater treatment facility, and copper limits.
  - The Division will continue to monitor compliance with the effluent copper limitations and will close the compliance schedule and resolve any eligible

violations related to the compliance schedule when treatment modifications are completed.

**CO0047091, Woodmen Hills Metro District WWTF**

- Violation
  - Ongoing BOD effluent violations
- Compliance Advisories
  - Notice of Non-Compliance May 25, 2018
- Facility corrective action measures
  - Woodmen Hills continues construction on new mechanical plant to meet permit limits at the facility. Completion was anticipated October 31, 2018 but Woodmen Hills recently requested an extension to the completion date for the loss of a subcontractor and construction delays.
- WQCD enforcement response
  - The Division approved the extension request and the new completion deadline is February 28, 2019. The Division continues to monitor Woodmen Hills' progress on the construction project.
- Other
  - In addition, Woodmen Hills has attempted and completed several interim measures to optimize the current treatment system. That said, given the constraints associated with Woodmen Hills' current lagoon system, consistent compliance will remain difficult until the new treatment plant can be completed.

**CO0020320, Town of Windsor**

- Violation
  - Total Phosphorus effluent exceedances August 2017 through March 2018
- Compliance Advisories
  - December 22, 2017
  - February 16, 2017
  - March 16, 2017
  - May 25, 2018
- Facility corrective action measures
  - The Town has completed improvements to meet phosphorus limits, which was the addition of an anaerobic zone for biological phosphorus removal. This was achieved by installing a curtain wall and floating mixers to the aeration basins. After several months of analysis and evaluation it was determined that chemical phosphorus removal would be necessary to achieve permit compliance.

- The construction was completed on October 20, 2017 and chemical feed began on October 25, 2017.
  - The facility has achieved effluent phosphorus results under the permit limit of 1.0 mg/L but the annual rolling average will require additional time to return to compliance. The facility does not anticipate any additional monthly limit exceedances and should return to compliance in the next month or two.
- WQCD enforcement response
  - The Division intends to monitor monthly results to ensure compliance with the limit is being met and will escalate as needed should future non-compliance occur.

**C00048445, Erie North Water Reclamation Facility**

- Violation
  - Ongoing effluent exceedances of potentially dissolved copper 2-year rolling average
- Compliance Advisories
  - Compliance advisories have not been sent as a result of the facility consistently submitting a cover letter with an explanation/update regarding the exceedance of the 2-year rolling average for copper.
- Facility corrective action measures
  - Erie is currently working on an expansion project and has received updated Preliminary Effluent Limits which eliminate the 2-year rolling average for copper.
  - Erie has also contacted a consultant to work on a corrosion control study in a continuing effort to minimize the amount of copper entering the facility through the drinking water system.
  - As a result of the corrosion control study the facility states it is effectively controlling pH in the Distribution system to help limit the influent copper to the wastewater facility.
- WQCD enforcement response
  - Enforcement is working with the Division's Permit Section to determine when the modified/renewed permit will be issued and will determine if enforcement escalation or an enforceable compliance schedule will be needed to address the issue while the expansion project is in progress.

**C00001104, Cherokee Station (Xcel Energy)**

- Violation
  - Compliance schedule violations in October 2017
- Compliance Advisories
  - None sent due permit appeal
- Facility corrective action measures
  - None due permit appeal

- WQCD enforcement response
  - None due permit appeal
- Potential future non-compliance
  - New permit became effective 7/1/18 with compliance schedule extensions for applicable parameters. Violations manually resolved as of 7/1/18.
- Other
  - NA

**C00027707, Swift-Beef Lone Tree**

- Violation
  - Compliance schedule violation in October 2017
- Compliance Advisories
  - Compliance advisory sent 12/22/17.
- Facility corrective action measures
  - JBS previously installed a brine evaporator but was unable to run at full capacity due to air issues. A full size air scrubber has been installed recently but still working out some electrical issues. The Q2 WET results have not been provided by the lab (AquaTox) so have yet to determine the effectiveness of the evaporator at full capacity. AquaTox created problems for multiple permittees as they were evidently “off line” for a number of weeks and unresponsive to all applicable permittees. JBS looking at new lab.
- WQCD enforcement response
  - Enforcement has been working with JBS and is awaiting the results of further WET testing to consider violation resolved.

Fort Morgan Facility – **Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

London Water Tunnel – **Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

CDOT- **Deliberative Process / Ex. 5**